

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

Abdi Nazemian, et al.,
Plaintiffs,
vs.

NVIDIA Corporation,
Defendant.

Andre Dubus III, et al.,
Plaintiffs,
vs.

NVIDIA Corporation,
Defendant.

Case No. 4:24-cv-01454-JST
Case No. 4:24-cv-02655-JST

**JOINT STIPULATION AND ~~PROPOSED~~
ORDER RE ESI PROTOCOL AND
PROTECTIVE ORDER SCHEDULE**

Judge: Hon. Jon S. Tigar
Courtroom: 6 - 2nd Floor

Pursuant to Civil Local Rule 7-12 and the Court's Minute Entry for proceedings held on October 21, 2024, (ECF No. 80), the undersigned Parties to the above-captioned action, by and through their respective counsel of record, hereby stipulate the following:

1. WHEREAS, on August 29, 2024, the Parties appeared before the Honorable Judge Tigar for an Initial Case Management Conference, (ECF No. 66);

2. WHEREAS, on September 9, 2024, the Court ordered the Parties to meet and confer on a proposed protective order and ESI protocol order, and established a schedule and requirements for submitting briefs if Parties could not reach agreement, (ECF No. 68);

3. WHEREAS, the Parties submitted their respective ESI protocol and protective order proposals and accompanying briefs on September 9, 2024, (ECF Nos. 73, 74), and responses and supplemental submissions thereafter (ECF Nos. 75, 76, 79);

4. WHEREAS, on October 21, 2024, the Parties appeared before the Court to present arguments regarding their respective ESI protocols and protective order proposals (ECF No. 80);

5. WHEREAS, the Court directed the Parties to further meet and confer to resolve disputed issues in their respective ESI protocol and protective order proposals, and to submit a stipulation or competing proposals with accompanying briefs by November 4, 2024, (ECF No. 80);

6. WHEREAS, the Parties have engaged in multiple meet and confer conferences and exchanged redlined drafts of the ESI protocol and protective order proposals since October 21, 2024, and have made significant progress toward narrowing the disputed issues in the respective proposals;

7. WHEREAS, the Parties believe that they can make additional progress by continuing to meet and confer on the remaining disputed issues.

NOW, THEREFORE IT IS HEREBY STIPULATED, by and between the Parties and their respective counsel, that the Parties' deadline to submit a stipulation, or competing proposed ESI Protocols, Protective Orders, and supportive briefs not to exceed 5 pages, shall be extended from November 4, 2024, to November 14, 2024.

1 Dated: November 4, 2024

Respectfully submitted,

2 By: /s/ Joseph R. Saveri

3 Joseph R. Saveri (SBN 130064)
4 Christopher K.L. Young (SBN 318371)
5 Elissa A. Buchanan (SBN 249996)
6 Evan Creutz (SBN 349728)
7 **JOSEPH SAVERI LAW FIRM, LLP**
8 601 California Street, Suite 1505
9 San Francisco, California 94108
10 Telephone: (415) 500-6800
11 Facsimile: (415) 395-9940
12 Email: jsaveri@saverilawfirm.com
13 cyoung@saverilawfirm.com
14 eabuchanan@saverilawfirm.com
15 ecreutz@saverilawfirm.com

16 Matthew Butterick (SBN 250953)
17 1920 Hillhurst Avenue, #406
18 Los Angeles, CA 90027
19 Telephone: (323) 968-2632
20 Facsimile: (415) 395-9940
21 mb@buttericklaw.com

22 Brian D. Clark (admitted *pro hac vice*)
23 Laura M. Matson (admitted *pro hac vice*)
24 Arielle Wagner (admitted *pro hac vice*)
25 Eura Chang (admitted *pro hac vice*)
26 **LOCKRIDGE GRINDAL NAUEN PLLP**
27 100 Washington Avenue South, Suite 2200
Minneapolis, MN 55401
Telephone: (612)339-6900
Facsimile: (612)339-0981
bdclark@locklaw.com
lmmatson@locklaw.com
aswagner@locklaw.com
echang@locklaw.com

Attorneys for the Nazemian Plaintiffs and the Proposed Class

1 Dated: November 4, 2024

Respectfully submitted,

2 By: /s/ Bryan L. Clobes

3 Bryan L. Clobes (admitted *pro hac vice*)

4 Alexander J. Sweatman (admitted *pro hac vice*)

5 Mohammed Rathur (admitted *pro hac vice*)

CAFFERTY CLOBES MERIWETHER

& SPRENGEL LLP

135 South LaSalle Street, Suite 3210

Chicago, IL 60603

Tel: 312-782-4880

bclobes@caffertyclobes.com

asweatman@caffertyclobes.com

mrathur@caffertyclobes.com

6 David A. Straite (admitted *pro hac vice*)

DiCELLO LEVITT LLP

485 Lexington Avenue, Suite 1001

New York, NY 10017

Tel. (646) 933-1000

dstraite@dicellolevitt.com

7 Amy E. Keller (admitted *pro hac vice*)

8 Nada Djordjevic (admitted *pro hac vice*)

9 James A. Ulwick (admitted *pro hac vice*)

DiCELLO LEVITT LLP

Ten North Dearborn Street, Sixth Floor

Chicago, Illinois 60602

Tel. (312) 214-7900

akeller@dicellolevitt.com

ndjordjevic@dicellolevitt.com

julwick@dicellolevitt.com

10 Brian O'Mara (SBN 229737)

DiCELLO LEVITT LLP

4747 Executive Drive

San Diego, California 92121

Telephone: (619) 923-3939

Facsimile: (619) 923-4233

briano@dicellolevitt.com

Counsel for the Dubus Plaintiffs and Proposed Class

1 Dated: November 4, 2024

Respectfully Submitted,

2 By: /s/ Sean S. Pak

3 **QUINN EMANUEL URQUHART &
SULLIVAN, LLP**

4 Sean S. Pak (SBN 219032)
5 seanpak@quinnemanuel.com
6 50 California Street, 22nd Floor
7 San Francisco, CA 94111
8 Telephone: (415) 875-6600
9 Facsimile: (415) 875-6700

10 Andrew H. Schapiro (admitted *pro hac vice*)
11 andrewschapiro@quinnemanuel.com
12 191 N. Wacker Drive, Suite 2700
13 Chicago, Illinois 60606
14 Telephone: (312) 705-7400
15 Facsimile: (312) 705-4001

16 Alex Spiro (admitted *pro hac vice*)
17 alexspiro@quinnemanuel.com
18 51 Madison Avenue, 22nd Floor
19 New York, NY 10010
20 Telephone: (212) 849-7000
21 Facsimile: (212) 849-7100

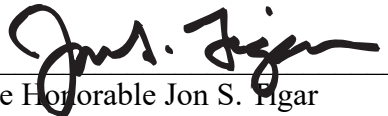
22 *Attorneys for Defendant NVIDIA Corporation*

~~[PROPOSED]~~ ORDER

Pursuant to the stipulation of the Parties, and for good cause appearing, it is hereby ORDERED that the Parties deadline for filing a stipulated ESI Protocol and stipulated Protective Order, or filing the Parties' respective proposals and briefs shall be continued to November 14, 2024.

IT IS SO ORDERED.

Dated: November 5, 2024



The Honorable Jon S. Fagar
U.S. District Court Judge

ATTESTATION PURSUANT TO CIVIL L.R. 5-1

The filer attests that the other signatories listed, on whose behalf the filing is also submitted, are registered CM/ECF filers and concur in the filing's content and have authorized the filing.

Dated: November 4, 2024

/s/ Joseph R. Saveri
Joseph R. Saveri